

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:10-CR-179(3)
	§	
JOVENAL MIRANDA CRUZ	§	
A/K/A/ JERRY M. CRUZ	§	

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

TO THE HONORABLE MELINDA HARMON, UNITED STATES DISTRICT JUDGE:

Jovenal Miranda Cruz (“Cruz”), Defendant, by counsel, respectfully requests the Court to modify the Order Setting Conditions of Release, to enlarge the area of unrestricted travel to include the continental United States.

Cruz’s travel was initially restricted to home confinement and he was subject to a location monitor. Later, the conditions of pre-trial release were modified and Cruz was no longer subject to location monitoring. *See Dkt. [201]*. The Court has allowed Cruz travel outside the district on several occasions. *See Dkts. [181], [244], [261]*.

Cruz intends to accompany his family on several out-of-district road trips this summer, including a trip to California. Cruz would still be required to seek advance approval of his travel from his pre-trial services officer and keep his pre-trial services officer apprised of his location and travel contact information.

Cruz’s pretrial services officer, Mr. Andrew Flores, is unopposed to this motion. Likewise, Assistant United States Attorney Melissa Annis is unopposed.

WHEREFORE, Cruz respectfully requests the Court enter an order amending his conditions of release to enlarge the area of unrestricted travel to include the continental United States.

Respectfully submitted,
HILDER & ASSOCIATES, P.C.

By: /s/ Philip H. Hilder
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ATTORNEYS FOR DEFENDANT,
JOVENAL MIRANDA CRUZ

CERTIFICATE OF CONFERENCE

I certify that via email on April 11, 2017, Melissa Annis, Assistant United States Attorney on this matter, indicated she is unopposed to this *Motion*.

/s/ Paul L. Creech
Paul L. Creech

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2017, a true and correct copy of the above and foregoing *Motion to Modify* was served on all counsel of record via ECF, certified mail, return receipt requested, or by hand delivery.

/s/ Philip H. Hilder
Philip H. Hilder